1	Timothy J. Conway, OSB No. 851752		
2	Direct Dial: (503) 802-2027 Email: tim.conway@tonkon.com		
3	Michael W. Fletcher, OSB No. 010448		
4	Direct Dial: (503) 802-2169 E-Mail: michael.fletcher@tonkon.com		
5	Ava Schoen, OSB No. 044072 Direct Dial: (503) 802-2143		
6	Email: ava.schoen@tonkon.com Tonkon Torp LLP		
7	888 SW Fifth Ave., Suite 1600		
8	Portland, OR 97204 Main: 503.221.1440		
9	Facsimile: 503.274.8779		
	Attorneys for Debtor		
10	UNITED STATES BANKRUPTCY COURT		
11	DISTRICT OF OREGON		
12	In re	Case No. 23-62260-dwh11	
13	Van's Aircraft, Inc., STIPULATION REGARDING CLAIM OF ROGER BROMILEY		
14	Debtor.	OF ROOER BROWNEET	
15			
16	A. On December 4, 2023, Van's Airc	raft, Inc. ("Van's") filed its voluntary petition	
17	for relief under Chapter 11 of Title 11 of the United States Code.		
18	B. Mr. Roger Bromiley ("Bromiley") was listed in Debtor's schedules as a creditor.		
19	C. A dispute arose with respect to the treatment of Bromiley's claim.		
20	D. Debtor and Bromiley have reached a settlement agreement whereby Bromiley will		
21	have an Allowed ¹ Class 5 General Unsecured Claim in the total amount of \$29,668.75.		
22	* * *		
23	* * *		
24			
25	1		
26	Capitalized terms not defined herein have the meaning defined in Debtor's Plan of Reorganization Pursuant to Subchapter V Under Chapter 11 (March 29, 2024).		

Page 1 of 2 – STIPULATION REGARDING CLAIM OF ROGER BROMILEY

1	DATED: June 9, 2025.	
2	IT IS SO STIPULATED:	
3	TONKON TORP LLP	
4	By /s/ Timothy J. Conway	
5	Timothy J. Conway, OSB No. 851752 Ava Schoen, OSB No. 044072	
6	Attorneys for Debtor	
7	MURRAY HUGHMAN	
8		
9	By /s/ Peter Hughman Peter Hughman	
10	Attorney for Bromiley	
11		
12	043989\00001\18516816v1	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

Page 2 of 2 – STIPULATION REGARDING CLAIM OF ROGER BROMILEY